

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Midas Green Technologies, LLC,

Plaintiff,

v.

**Rhodium Enterprises, Inc.;
Rhodium Technologies LLC;
Rhodium 10mw LLC;
Rhodium 2.0 LLC;
Rhodium 30mw LLC;
Rhodium Encore LLC;
Rhodium Industries LLC;
Rhodium JV LLC;
Rhodium Renewables LLC;
Rhodium Shared Services LLC;
Rhodium Shared Services PR Inc.;
Chase Blackmon;
Cameron Blackmon;
Nathan Nichols;
Rhodium 2.0 Sub LLC;
Rhodium Encore Sub LLC;
Rhodium Renewables Sub LLC;
Rhodium Ready Ventures LLC;
Rhodium 10MW Sub LLC;
Rhodium 30MW Sub LLC;
I Ventures Enterprises LLC (fka Energy
Tech LLC);
Air HPC LLC;
Jordan HPC LLC; and
Jordan HPC Sub LLC.**

Defendants.

CASE NO. 6:22-CV-00050

JURY TRIAL DEMANDED

NOTICE OF UNOPPOSED REQUEST TO CHANGE DEADLINE

Pursuant to the Court's March 7, 2022 Amended Standing Order Regarding Joint or Unopposed Request to Change Deadlines, Defendants Rhodium Enterprises, Inc., Rhodium Technologies LLC, Rhodium 10mw LLC, Rhodium 2.0 LLC, Rhodium 30mw LLC, Rhodium Encore LLC, Rhodium Industries LLC, Rhodium JV LLC, Rhodium Renewables LLC,

Rhodium Shared Services LLC, Rhodium Shared Services PR Inc., Chase Blackmon; Cameron Blackmon; Nathan Nichols; Rhodium 2.0 Sub LLC; Rhodium Encore Sub LLC; Rhodium Renewables Sub LLC; Rhodium Ready Ventures LLC; Rhodium 10MW Sub LLC; Rhodium 30MW Sub LLC; I Ventures Enterprises LLC (fka Energy Tech LLC); Air HPC LLC; Jordan HPC LLC; and Jordan HPC Sub LLC (collectively, “Defendants”), submit this Notice of Unopposed Request to Change Deadline to respond to Midas Green Technologies, LLC’s Opposed Motion to Modify Scheduling Order (Dkt. 73). Defendants sought a 7-day extension up to and including January 10, 2023. Plaintiff confirmed that it is not opposed to an extension to January 6, 2023. Thus the parties agree that Defendants’ deadline to response to Midas Green Technologies, LLC’s Opposed Motion to Modify Scheduling Order (Dkt. 73) is January 6, 2023.

Dated: January 2, 2023

Respectfully submitted,

KIRKLAND & ELLIS LLP

By: /s/ Kat Li

Kat Li

State Bar No. 24070142

kat.li@kirkland.com

401 Congress Avenue

Austin, TX 78701

Telephone: (512) 678-9100

Facsimile: (512) 678-9101

ATTORNEY FOR DEFENDANTS

Rhodium Enterprises, Inc., Rhodium

Technologies LLC, Rhodium 10mw LLC,

Rhodium 2.0 LLC, Rhodium 30mw LLC,

Rhodium Encore LLC, Rhodium Industries

LLC, Rhodium JV LLC, Rhodium Renewables

LLC, Rhodium Shared Services LLC,

Rhodium Shared Services PR Inc., and

Nathan Nichols

CERTIFICATE OF CONFERENCE

In compliance with Local Rule CV-7(i), counsel for Defendant conferred with counsel for Plaintiff regarding the notice for extension of time by electronic mail on December 31, 2022. Counsel for Plaintiff does not oppose this notice and the extension sought hereby.

/s/ Kat Li

Kat Li

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on January 2, 2023 with a copy of this document via the Court's CM/ECF system.

/s/ Kat Li

Kat Li